

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**City of Valparaiso, Elden Kuehl Pollution Control Facility
1251 Joliet Road
Valparaiso, Indiana 46383**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 127-10673-00088	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: Expiration Date:

TABLE OF CONTENTS

A	SOURCE SUMMARY	4
A.1	General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]	
A.2	Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]	
A.3	Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]	
A.4	Part 70 Permit Applicability [326 IAC 2-7-2]	
B	GENERAL CONDITIONS	6
B.1	Definitions [326 IAC 2-7-1]	
B.2	Permit Term [326 IAC 2-7-5(2)]	
B.3	Enforceability [326 IAC 2-7-7]	
B.4	Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]	
B.5	Severability [326 IAC 2-7-5(5)]	
B.6	Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]	
B.7	Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]	
B.8	Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]	
B.9	Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]	
B.10	Annual Compliance Certification [326 IAC 2-7-6(5)]	
B.11	Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1)and(6)] [326 IAC 1-6-3]	
B.12	Emergency Provisions [326 IAC 2-7-16]	
B.13	Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]	
B.14	Multiple Exceedances [326 IAC 2-7-5(1)(E)]	
B.15	Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]	
B.16	Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]	
B.17	Permit Renewal [326 IAC 2-7-4]	
B.18	Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]	
B.19	Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]	
B.20	Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]	
B.21	Source Modification Requirement [326 IAC 2-7-10.5]	
B.22	Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]	
B.23	Transfer of Ownership or Operational Control [326 IAC 2-7-11]	
B.24	Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]	
C	SOURCE OPERATION CONDITIONS	18
	Emission Limitations and Standards [326 IAC 2-7-5(1)]	
C.1	Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]	
C.2	Opacity [326 IAC 5-1]	
C.3	Open Burning [326 IAC 4-1] [IC 13-17-9]	
C.4	Incineration [326 IAC 4-2] [326 IAC 9-1-2]	
C.5	Fugitive Dust Emissions [326 IAC 6-4]	
C.6	Operation of Equipment [326 IAC 2-7-6(6)]	
C.7	Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]	

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
[326 IAC 2-7-6]

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
[326 IAC 2-6]

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS: Engines and Flare 25

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.1.3 Digester Waste Gas

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Flare Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

D.1.6 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS: Insignificant Activities 27

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

Certification 29

Emergency Occurrence Report 30

Quarterly Report	32
Quarterly Deviation and Compliance Monitoring Report	33
Natural Gas-Fired Engine Certification	35

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary wastewater treatment source.

Responsible Official:	Donald McGinley
Source Address:	1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address:	1251 Joliet Road, Valparaiso, Indiana 46383
SIC Code:	4952
County Location:	Porter
Source Location Status:	Nonattainment for ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) natural gas-fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2, respectively, installed in 1985, exhausted through Stacks #1 and #2, respectively, rated at 4.86 million British thermal units per hour, each.
- (b) One (1) digester waste gas-fired flare, known as Unit #3, installed in 1983, exhausted through Stack #3, rated at 1.15 million British thermal units per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Two (2) natural gas-fired boilers, known as Boilers #2 and #3, rated at 6.75 million British thermal units per hour, each.
- (b) One (1) natural gas and digester gas-fired boiler, known as Boiler #1, rated at 6.75 million British thermal units per hour.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B.1 Definitions [326 IAC 2-7-1]

B.2 Permit Term [326 IAC 2-7-5(2)]

B.3 Enforceability [326 IAC 2-7-7]

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

B.5 Severability [326 IAC 2-7-5(5)]

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When

furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard

Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

Telephone Number: 219-881-6712 (Northwest Regional Office)
Facsimile Number: 219-881-6745 (Northwest Regional Office)
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit

shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

- (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
 - (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final

action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12(b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20 (b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this permit;
- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAM of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 19, 1999.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance

Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline.
- (c) IDEM, OAM reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available

upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) Two (2) natural gas-fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2, respectively, installed in 1985, exhausted through Stacks #1 and #2, respectively, rated at 4.86 million British thermal units per hour, each.
- (b) One (1) digester waste gas-fired flare, known as Unit #3, installed in 1983, exhausted through Stack #3, rated at 1.15 million British thermal units per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Emission Offset Minor Limit [326 IAC 2-3]

The total input of natural gas to the two (2) natural gas-fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2 shall be limited to less than 13.053 million cubic feet per twelve (12) consecutive month period. This fuel limit is equivalent to less than 15.79 tons of NO_x per year. Therefore, the requirements of 326 IAC 2-3 (Emission Offset) do not apply.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the two (2) natural gas-fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2.

Compliance Determination Requirements

D.1.3 Digester Waste Gas

The digester waste gas-fired flare, known as Unit #3, shall be in operation and control emissions of digester gas at all times that the digester gas is vented to the flare or the digester gas shall be used as a fuel for the one (1) boiler, known as Boiler #1, rated at 6.75 million British thermal units per hour.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.4 Flare Notations

- (a) Observations of the presence of a flame at the flare should be monitored once per shift when digester gas is vented to the flare. A trained employee shall record whether the flame is present.
- (b) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance of a flame at the flare.
- (c) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.5 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records at the source of the natural gas usage for the two (2) natural gas-fired reciprocating internal combustion compressor engines.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records of observations of the presence of the flame at the flare once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.6 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The Permittee shall certify, on the form provided, that natural gas was fired in each of the engines at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities

- (a) Two (2) natural gas fired boilers, known as Boilers #2 and #3, rated at 6.75 million British thermal units per hour, each.
- (b) One (1) natural gas and digester gas fired boiler, known as Boiler #1 rated at 6.75 million British thermal units per hour.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (d)), particulate emissions from the three (3) boilers, known as Boilers #1, #2 and #3, used for indirect heating purposes, installed after September 21, 1983, shall not exceed 0.499 pounds of particulate matter per million British thermal units heat input.

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the insignificant cold cleaner degreaser facility construction of which commenced after July 1, 1990, shall ensure that the following control equipment requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility construction of which commenced after July 1, 1990 shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-10673-00088

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-10673-00088

This form consists of 2 pages

Page 1 of 2

- 9** This is an emergency as defined in 326 IAC 2-7-1(12)
- C** The Permittee must notify the Office of Air Management (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 - C** The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-10673-00088
Facility: Two (2) natural gas-fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2
Parameter: Natural Gas Burned
Limit: 13.053 million cubic feet (MMCF) per twelve (12) consecutive month period, total, equivalent to 15.79 tons of NO_x per year.

YEAR: _____

Month	Natural Gas Burned This Month	Natural Gas Burned Previous 11 Months	Natural Gas Burned 12 Month Total
	(MMCF)	(MMCF)	(MMCF)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT**

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-10673-00088

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS-FIRED ENGINE CERTIFICATION**

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-10673-00088

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Engine Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Location: 1251 Joliet Road, Valparaiso, Indiana 46383
County: Porter
SIC Code: 4952
Operation Permit No.: T 127-10673-00088
Permit Reviewer: Frank P. Castelli

On September 27, 2000, the Office of Air Management (OAM) had a notice published in the Chesterton Tribune, Chesterton, Indiana, stating that City of Valparaiso, Elden Kuehl Pollution Control Facility had applied for a Part 70 Operating Permit for the operation of a wastewater treatment source. The notice also stated that OAM proposed to issue a Part 70 Operating Permit for this operation and provided information on how the public could review the proposed Part 70 Operating Permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Part 70 Operating Permit should be issued as proposed.

Upon further review, the OAM has decided to make the following changes to the Part 70 Operating Permit: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

Front Page

- The expiration has been added to the signature box. The expiration is exactly 5 years after the issuance date. For example, if the permit was issued December 13, 1996, the expiration date would be December 13, 2001.

Operation Permit No.: T 127-10673-00088	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: Expiration Date:

Section A

- Condition A.1 (General Information) has had the following rule cite added which is the definition of a major source in 326 IAC 2-7. IDEM is no longer including the phone number of the contact person, because it is cumbersome to do an administrative amendment every time the telephone number is changed as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] **[326 IAC 2-7-1(22)]**

Phone Number: ~~219 - 464 - 4973~~

Section B

2. Condition B.1 (Permit No Defense) has been deleted. This is not in IC13, but IDEM has the general authority for this in 326 IAC 2-7-15. Therefore, most of this language has been added to Condition B.14 (now B.13)(Permit Shield). Condition B.14 (now B.13) provides for when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance. All other B conditions have been re-numbered as a result of this change.

~~B.1 Permit No Defense [IC 13]~~

- ~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~
- ~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

3. Condition B.3 (now B.2) (Permit Term) has had language added to clarify that amendments, revisions or modifications do not extend the expiration date of the permit. The expiration date will always be five (5) years from the issuance date of the original permit. The expiration date will now be typed in the signature box as well.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the ~~effective~~ **original** date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. **Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.**

4. Condition B.8 (now B.7) (Duty to Supplement and Provide Information) The condition has been reworded to match the language in the rule as follows:

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] **[326 IAC 2-7-6(6)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). **Upon request, the Permittee shall also furnish to IDEM, OAM,**

copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

- (c) ~~Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to~~ **When** furnishing copies of requested records directly to U. S. EPA, ~~then the Permittee must furnish record directly to the U. S. EPA.~~ The Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

5. Condition B.9 (now B.8) (Compliance with Permit Conditions) (c) has been added to clarify that an emergency does constitute a defense in an enforcement action if the Permittee complies with the emergency procedures as follows:

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
- (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) **An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.**

6. Condition B.10 (now B.9)(Certification) (b) has been modified to clarify when a certification is needed as follows:

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (b) One (1) certification shall be included, ~~on~~ **using** the attached Certification Form, with each submittal **requiring certification.**

7. Condition B.11 (now B.10) (Annual Compliance Certification) paragraph (a) has been revised to clarify that the initial certification is from the date of issuance until December 31. Paragraph (c) has been revised so that it matches the language in the rule.

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. **The initial certification shall cover the time period from the date of final permit issuance through December 31 of**

the same year. All subsequent The certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining **the** compliance **status** of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- 8. Condition B.12 (now B.11) (Preventive Maintenance Plan) the record keeping requirements have been added to this condition.

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

-
- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond it's the **Permittee's** control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
 - (c) A copy of the PMPs shall be submitted to IDEM, OAM, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
 - (d) **Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**
9. In Condition B.13 (now B.12)(Emergency Provisions) a reference to the Emergency Occurrence Report Form has been added to Condition B.13(b)(5) (now B.12(b)(5)). The emergency form is for emergencies only , and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. In paragraph (d), part of the first sentence has been deleted. Since this is a Part 70 source, the malfunction rule has been superceded by the emergency rule. Paragraph (f) "compliance" has been changed to "accordance".

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, **and Northwest Regional Office** within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

Telephone Number: 219-881-6712 (Northwest Regional Office)

Facsimile Number: 219-881-6745 (Northwest Regional Office)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** notice, either in ~~writing by mail~~ or facsimile, ~~of the emergency~~ to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this~~

~~rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

10. Condition B.14 (now B.13)(Permit Shield)has incorporated some of the language from Condition B.1. In Condition B.14(d) some of the language has been removed because it is unnecessary and would be contradictory to IDEM's revision of operating permits as follows:

B.14 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
 - (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit~~, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
 - (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
 - (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
 - (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(7)]
11. Condition B.16 (now B.15) (Deviations from Permit Requirements and Conditions) has been revised because IDEM is no longer requiring sources to report deviations in 10 days. Sources will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since IDEM relaxed the ten (10) day notification to a quarterly report.
- B.16** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency

Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance ~~Branch~~ **Data Section**, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~ **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.**

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3)~~**(2)** Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**
- ~~(e) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~
- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

12. Condition B.18 now B.17 (Permit Renewal), Section (b)(2): the extra comma after OAM has been removed as follows:

B.18 Permit Renewal [326 IAC 2-7-4]

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

13. Condition B.19 (now B.18) (Permit Amendment or Modification) 326 IAC 2-7-4(f) revised to clarify that all applications need to be certified by the responsible official. EPA has also requested this change.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) ~~only if a certification is required by the terms of the applicable rule.~~
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

14. Condition B.21 (now B.20) (Operational Flexibility) (b) has been reorganized. Paragraph (b)(1) was deleted so that this condition would be consistent with the language in the rule as follows:

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). ~~and the following additional conditions:~~
 - ~~(1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~
 - (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - ~~(A)(1)~~ A brief description of the change within the source;

~~(B)~~(2) The date on which the change will occur;

~~(C)~~(3) Any change in emissions; and

~~(D)~~(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

15. Condition B.22 (now B.21) (Source Modification Requirement) has had the cite 326 IAC 2 added to make the condition more complete. The language "applicable provisions" has been removed because it is unnecessary as follows:

B.22 Source Modification Requirement [326 IAC 2] [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by the applicable provisions of **326 IAC 2 and 326 IAC 2-7-10.5.**

16. Condition B.23 (now B.22) (Inspection and Entry), the wording "At reasonable times" has been deleted because neither the rule nor the statute limits IDEM. IDEM could ask for these at any time.

B.23 Inspection and Entry [326 IAC 2-7-6(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, and U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, ~~at reasonable times~~, any records that must be kept under the conditions of this permit;
 - (c) Inspect, ~~at reasonable times~~, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) Sample or monitor, ~~at reasonable times~~, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
 - (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. ~~[326 IAC 2-7-6(6)]~~
17. Condition B.24 (now B.23) (Transfer of Ownership or Operational Control) has been revised to clarify that 326 IAC 2-7-4(f) requires all applications to be certified by the responsible official. EPA has also requested this change.

B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

18. Condition B.25 (now B.24) (Annual Fee Payment) has had the rule cite added to paragraph (a) as follows:

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. **Pursuant 326 IAC 2-7-19(b)**, if the Permittee does not receive a bill from IDEM, OAM, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

Section C

19. Condition C.6 (Operation of Equipment) has been added as follows:

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute, rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

20. Condition C.6 (now C.7) (Asbestos Abatement Projects) has had the rule cite in the title changed to make it more generalized as follows:.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] ~~[40 CFR 61.140]~~ [40 CFR 61, Subpart M]

21. Condition C.7 (now C.8) (Performance Testing) has had the word "within" changed to "not later than" as follows:

C.7 Performance Testing [326 IAC 3-6]

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAM ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

22. Condition C.9 (now C.10) (Compliance Monitoring) - There are times when compliance monitoring is required by a MACT that the source does not have to comply with yet. Therefore, language has been added to clarify that the permit will specify when Compliance Monitoring does not have to start in ninety (90) days. The same idea applies to new units, if the MACT does not apply yet, IDEM would not expect the source to start compliance monitoring.

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

23. Condition C.10 (now C.11) (Monitoring Methods) has had the following rule cites added.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60 Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

24. Condition C.11 (now C.12) (Emergency Reduction Plans) has had (c) and (d) deleted as follows.

C.11 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 19, 1999.
- (b) If the ERP is disapproved by IDEM, OAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- ~~(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.~~
- ~~(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.~~
- ~~(e)~~**(c)** Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

25. Condition C.12 (now C.13) (Risk Management Plan) has been revised to reflect the fact that if a source is subject to 40 CFR 68, they should have already submitted a Risk Management Plan as follows:

C.17 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68 ~~by the date provided in 40 CFR 68.10(a);~~ or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

26. Condition C.13 (now C.14)(Compliance Monitoring Plan - Failure to Take Response Steps) has had the following changes made: (a) "of" was added, (c) ";or" has been replaced with a period, (f) "(5%)" has been added to be consistent with the rest of the permit and changes were made to (a)(5) and (f).

C.13 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole ~~of~~ information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps ~~shall~~ **may** constitute a violation of the permit.
 - (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied. ~~or~~
 - (3) An automatic measurement was taken when the process was not operating. ~~or~~
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
 - (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
 - (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
 - (f) ~~If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.~~
 - ~~(1) —~~ At its discretion, IDEM may excuse **the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides** ~~such failure providing adequate justification is documented and documents that such~~ failures do not exceed five percent **(5%)** of the operating time in any quarter.
 - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.
27. In Condition C.14 (now C.15) (Actions Related to Noncompliance Demonstrated by a Stack Test), the phrase "corrective actions" has been changed to "response actions" to be consistent with the rest of the permit as follows:
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate **corrective response** actions. The Permittee shall submit a description of these **corrective response** actions to IDEM, OAM, within thirty (30) days of receipt of the

test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the ~~corrective~~ **response** actions are being implemented.

28. Condition C.15 (now C.16)(Emission Statement) the word "estimated" was added to (a)(1) and (a)(2) because that is how 326 IAC 2-6 describes emissions as follows.

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

- (1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Indicate **estimated** actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

29. Condition C.16 (now C.17) (General Record Keeping Requirements) the word "monitoring" was removed so that the condition will seem more generalized to all record keeping, the word "reports" was added to clarify that the source must keep copies of those as well. Paragraphs (b) and (c) have been removed because they were unnecessary.

C.16 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) Records of required monitoring information shall include, where applicable:~~

- ~~(1) The date, place, and time of sampling or measurements;~~
- ~~(2) The dates analyses were performed;~~
- ~~(3) The company or entity performing the analyses;~~
- ~~(4) The analytic techniques or methods used;~~
- ~~(5) The results of such analyses; and~~
- ~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

- ~~(1) Copies of all reports required by this permit;~~

~~All original strip chart recordings for continuous monitoring instrumentation;~~

~~(3) All calibration and maintenance records;~~

~~(4) Records of preventive maintenance.~~

~~(d)~~**(b)** Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

30. Condition C.17 (now C.18) (General Reporting Requirements) has changed the Semi-Annual Compliance Monitoring Report to the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report has been deleted. All the information is in Condition B.13. In paragraph (d) IDEM has clarified that the report does need to be certified by the responsible official. This change is also reflected in all the D sections and the reporting forms. EPA has also requested this change.

C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

~~(a)~~ To affirm that the source has met all the compliance monitoring requirements stated in this permit The source shall submit **a the attached Quarterly or Semi-Annual Deviation and Compliance Monitoring Report or its equivalent.** Any deviation from the permit requirements, ~~and~~, the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The **Quarterly Deviation and Compliance Monitoring Report** shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports ~~do not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

~~(e)~~ All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. ~~The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(f)~~ Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(g)~~**(e)** The first report shall cover the period commencing on the date of issuance of this permit and

ending on the last day of the reporting period. Reporting periods are based on calendar years.

Section D

31. Condition D.1.6 (Reporting Requirements) have been revised to require that these reports should be certified by the responsible official. Part 70 requires all reports, except emergency reports, to be certified. EPA has also requested this change.

D.1.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

32. Conditions D.2.2 and Condition D.2.3 (Volatile Organic Compounds (VOC)) for insignificant activities have been clarified to indicate which activities are subject to which rule as follows:

D.2.2 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations) **for cold cleaning operations constructed after January 1, 1980**, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.3 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility **construction of which commenced after July 1, 1990**, shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or

- (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent ~~is~~ used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility **construction of which commenced after July 1, 1990**, shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Forms

33. Emergency/Deviation Occurrence Report Form is now called the Emergency Occurrence Report. All references to deviations have been removed. These forms should be sent to the Compliance Branch, not the Compliance Data Section. IDEM has negotiated with EPA on the reporting of emergencies. They agree to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That

report is certified by the responsible official, therefore will comply with the Part 70 requirement to have all reports certified.

34. The monthly and quarterly reports will now need to be certified by the responsible official, therefore the last line in each of these reports have been changed from ~~"A certification is not required for this report."~~ to **"Attach a signed certification to complete this report"**.
35. The Semi-Annual Compliance Monitoring Report, is now called the Quarterly Deviation and Compliance Monitoring Report. The form now requires the source to not only report that there were deviations, but to also include the probable cause and the response steps taken. IDEM is no longer requiring sources to report deviations in ten days, therefore every source will need submit this report quarterly. For sources with an applicable requirement which gives an alternate schedule for reporting deviations, those deviations will not need to be reported quarterly, but instead should be reported according to the schedule in the applicable requirement.
36. The natural gas-fired engine certification report will now need to be certified by the responsible official, therefore the last line in this reports has been changed as follows: "A certification by the responsible official as defined by 326 IAC 2-7-1(34) is ~~not~~ required for this report."

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
~~COMPLIANCE DATA SECTION~~ **BRANCH**
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
~~EMERGENCY/DEVIATION~~ **OCCURRENCE REPORT**

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-10673-00088

This form consists of 2 pages Page 1 of 2

Check either No. 1 or No. 2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12) <input type="checkbox"/> The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and <input type="checkbox"/> The Permittee must submit notice in writing by mail or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(C) <input type="checkbox"/> The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/ Deviation :
Describe the cause of the Emergency/ Deviation :

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY SEMI-ANNUAL DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-10673-00088

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the ~~compliance monitoring~~ requirements stated in this permit. This report shall be submitted **quarterly semi-annually** based on a calendar year. Any deviation from the ~~compliance monitoring~~ requirements, and the date(s) of each deviation, **the probable cause of the deviation, and the response steps taken** must be reported. ~~with the following exceptions: Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.~~ Additional pages may be attached if necessary. ~~This form can be supplemented by attaching the Emergency/Deviation Occurrence Report.~~ If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

~~Compliance Monitoring Permit~~ Requirement (specify permit condition #)

Date of ~~each~~ Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

~~Compliance Monitoring Permit~~ Requirement (specify permit condition #)

Date of ~~each~~ Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Compliance Monitoring Permit Requirement (specify permit condition #)	
Date of each Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Compliance Monitoring Permit Requirement (specify permit condition #)	
Date of each Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Compliance Monitoring Permit Requirement (specify permit condition #)	
Date of each Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address: 1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.: T 127-10673-00088
Facility: Two (2) natural gas-fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2
Parameter: Natural Gas Burned
Limit: 13.053 million cubic feet (MMCF) per twelve (12) consecutive month period, total, equivalent to 15.79 tons of NO_x per year.

YEAR: _____

Month	Natural Gas Burned This Month	Natural Gas Burned Previous 11 Months	Natural Gas Burned 12 Month Total
	(MMCF)	(MMCF)	(MMCF)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

~~A certification is not required for this report.~~ **Attach a signed certification to complete this report.**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
NATURAL GAS-FIRED ENGINE CERTIFICATION**

Source Name:City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Address:1251 Joliet Road, Valparaiso, Indiana 46383
Mailing Address:1251 Joliet Road, Valparaiso, Indiana 46383
Part 70 Permit No.:T 127-10673-00088

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Engine Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is ~~not~~ required for this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Source Location: 1251 Joliet Road, Valparaiso, Indiana 46383
County: Porter
SIC Code: 4952
Operation Permit No.: T 127-10673-00088
Permit Reviewer: Frank P. Castelli

The Office of Air Management (OAM) has reviewed a Part 70 permit application from City of Valparaiso, Elden Kuehl Pollution Control Facility relating to the operation of a wastewater treatment source. This source has requested a Part 70 Operating permit, rather than a Federally Enforceable State Operating Permit (FESOP).

Permitted Emission Units and Pollution Control Equipment

There are no permitted facilities operating at this source during this review process.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

- (a) Two (2) natural gas-fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2, respectively, installed in 1985, exhausted through Stacks #1 and #2, respectively, rated at 4.86 million British thermal units per hour, each.
- (b) One (1) digester waste gas-fired flare, known as Unit #3, installed in 1983, exhausted through Stack #3, rated at 1.15 million British thermal units per hour.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including two (2) natural gas fired boilers, known as Boilers #2 and #3, rated at 6.75 million British thermal units per hour, each and one (1) natural gas and digester gas fired boiler, known as Boiler #1 rated at 6.75 million British thermal units per hour.
- (b) The following VOC and HAP storage containers: vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (c) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326

IAC 20-6.

- (d) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1 percent by volume.
- (e) Activities associated with the transportation and treatment of sanitary sewage, provided discharge to the treatment plant is under the control of the owner/operator, that is, an on-site sewage treatment facility.
- (f) Paved and unpaved roads and parking lots with public access.
- (g) Asbestos abatement projects regulated by 326 IAC 14-10.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (j) On-site fire and emergency response training approved by the department.
- (k) A laboratory as defined in 326 IAC 2-7-1(21)(D).

Existing Approvals

The source does not have any previous approvals.

Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) IDEM was informed on August 14, 2000 that the actual NO_x emissions reported for 1998 and 1999 were in error and the source's actual NO_x emissions were less than twenty five (25) tons per year for both years.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on February 19, 1999. Additional information was received on January 31, April 28 and August 14, 2000.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 6 of Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.342
PM ₁₀	0.848
SO ₂	0.283
VOC	3.83
CO	85.3
NO _x	112

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPs	Potential To Emit (tons/year)
Benzene	0.103
Acetaldehyde	0.004
Formaldehyde	0.013
Acrolein	0.002
Toluene	0.003
Ammonia	0.008
Xylene	0.001
Naphthalene	0.000002
Propylene	0.000007

HAPs	Potential To Emit (tons/year)
Dichlorobenzene	0.00007
Hexane	0.159
Manganese Compounds	0.00002
Lead Compounds	0.00003
Cadmium Compounds	0.00007
Chromium Compounds	0.00008
Nickel Compounds	0.0001
Dichloromethane	0.004
Styrene	0.002
1,1,1 Trichloroethane	0.011
TOTAL	0.312

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of nitrogen oxides (NO_x) is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of nitrogen oxides (NO_x) is equal to or greater than twenty-five (25) tons per year. Therefore, the source could be subject to the provisions of 326 IAC 2-3 (see discussion in State Rule Applicability).
- (c) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year.
- (d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the applicant supplied information from Form GSD-07 with the correction that NO_x emissions < 25 TPY.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM ₁₀	0.0
SO ₂	not available

VOC	1.63
CO	3.80
NO _x	less than 25
HAP	not reported

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Two (2) Natural Gas-fired Reciprocating Internal Combustion Engines/Blowers	0.005	0.005	0.004	0.207	11.1	less than 15.79	Single less than 10
One (1) Digester Gas-fired Waste Gas Flare	0.143	0.143	0.000	0.000	6.30	0.336	Single less than 10
Boilers #2 & #3 Boiler #1 Insignificant Combustion	0.112 0.056	0.449 0.225	0.036 0.222	0.325 0.163	4.97 2.48	5.91 2.96	Single less than 10
Insignificant Activities	0.00	0.00	0.00	2.00	0.00	0.00	2.00
Total Emissions	0.316	0.822	0.262	2.70	24.9	less than 25.0	2.31

The NO_x emissions from the two (2) internal combustion engines have been limited to less than 15.79 tons per year, equivalent to 13.053 million cubic feet of natural gas per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-3 (Emission Offset). This limit of 15.79 tons per year combined with the full potential to emit NO_x of 9.21 tons per year from the boilers and the digester gas waste flare assures that the Emission Offset Threshold Level of twenty-five (25) tons per year is not reached.

County Attainment Status

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment

NO ₂	attainment/unclassifiable
Ozone	severe nonattainment
CO	attainment
Lead	unclassifiable

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Porter County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) This Part 70 was received after April 20, 1998 and therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, could be applicable. This Part 70 does not involve a pollutant-specific emissions unit with the potential to emit with a control in an amount equal to or greater than one hundred (100) tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The total source potential emissions of all attainment pollutants (PM, PM₁₀, SO₂ and CO) are less than two hundred and fifty (250) tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 do not apply.

326 IAC 2-3 (Emission Offset)

The total source potential emissions after controls and limits of NO_x are less than twenty-five (25) tons per year. The NO_x emissions from the two (2) internal combustion engines have been limited to less than 15.79 tons per year, equivalent to 13.053 million cubic feet of natural gas per twelve (12) consecutive month period to avoid the applicability of 326 IAC 2-3 (Emission Offset). This limit of 15.79 tons per year combined with the full potential to emit NO_x of 9.21 tons per year from the boilers and the digester gas waste flare assures that the Emission Offset Threshold Level of twenty-five (25) tons per year is not reached.

Note, the potential to emit VOC from this source is less than twenty-five (25) tons per year, therefore 326 IAC 2-3 is not applicable due to the potential to emit of VOC.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO_x in Porter County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 2-7-5(13) (Preventive Maintenance Plan)

A Preventive Maintenance Plan is required for the two (2) natural gas-fired reciprocating internal combustion compressor engines coupled with blowers, known as Unit #1 and #2, respectively because a fuel use limit is required to avoid the requirements of 326 IAC 2-3 (Emission Offset).

326 IAC 5-1 (Opacity Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-2-4 (Emission limitations for facilities specified in 326 IAC 6-2-1(d))

The three boilers, #1, #2 and #3 with a combined total rating of 20.25 million British thermal units per hour, installed after September 21, 1983, are subject to the requirements of this rule that limits PM emissions as follows:

$$Pt = \underline{1.09}$$

$$Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units.

Q = Total source maximum operating capacity rating in million British thermal units heat input. The maximum operating capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's operation permit application, except when some lower capacity is contained in the facility's operation permit, in which case, the capacity specified in the operation permit shall be used.

$$Pt = \frac{1.09}{20.25^{0.26}} = 0.499 \text{ pounds per million British thermal units.}$$

The PM emission factor for each of the three (3) boilers on natural gas is 1.9 pound per million cubic feet of natural gas according to AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3. The potential throughput at each boiler, each rated at 6.75 million British thermal units per hour, is 59.1 million cubic feet of natural gas per year (6.75 MMBtu/hr x 8,760 hrs/yr x 1 MMCF/ 1,000 MMBtu). Therefore, the potential to emit is 0.056 tons per year (59.1 MMCF/yr x 1.9 lbs/MMCF x 1 ton/2,000 lbs).

$$0.056 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.013 \text{ lb/hr}$$

$$(0.013 \text{ lb/hr} / 36.75 \text{ MMBtu/hr}) = 0.002 \text{ lb PM per MMBtu}$$

Therefore, the three (3) boilers comply with this rule.

326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations)

This rule is not applicable because the potential to emit SO₂ from all facilities and from the entire source is less than twenty-five (25) tons per year.

326 IAC 8-1-6 (New facilities: general reduction requirements)

Since there are no 326 IAC 8 rules that apply to this source 326 IAC 8-1-6, which requires Best Available Control Technology (BACT), could apply. This rule is not applicable since the potential VOC emissions from this source are less than twenty-five (25) tons per year.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark, and Floyd Counties)

Since the potential to emit VOC is less than twenty-five (25) tons per year and the source does not perform any surface coating operations, the requirements of this rule do not apply.

State Rule Applicability - Insignificant Activities

326 IAC 8-3 (Organic Solvent Degreasing Operations)

(a) All parts washers constructed after January 1, 1980 are subject to the requirements of 326 IAC 8-3-2 (Cold Cleaner Operations) and the Permittee shall:

(1) Equip the cleaner with a cover;

- (2) Equip the cleaner with a facility for draining cleaned parts;
 - (3) Close the degreaser cover whenever parts are not being handled in the cleaner;
 - (4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
 - (5) Provide a permanent, conspicuous label summarizing the operation requirements;
 - (6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.
- (b) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following control equipment requirements are met for the parts washer(s) constructed after July 1, 1990:
- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
 - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

- (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (c) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the Permittee shall ensure that the following operating requirements are met for the parts washer(s) constructed after July 1, 1990:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Testing Requirements

The source is not required to test any of the facilities because standard emissions factors were used for all the significant emission units.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) Record keeping and reporting requirements to show compliance with the fuel use limit.

These conditions are necessary to ensure compliance with 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7.
- (b) Observations of the presence of a flame at the flare should be monitored once per shift.

These conditions are necessary to ensure compliance with 326 IAC 2-3 (Emission Offset) and 326 IAC 2-7.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See pages 3, 5 and 6 of Appendix A for detailed air toxic calculations.

Conclusion

The operation of this wastewater treatment source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T 127-10673-00088**.

Appendix A: Emissions Calculations

Total Emissions
Waste Water Treatment
SIC Code: 4952

Summary of Potential Emissions

Company Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Address City IN Zip: 1251 Joliet Road, Valparaiso, IN 46838
Part 70: T 127-10673
Plt ID: 127-00088
Reviewer: Frank P. Castelli
Date: February 19, 1999

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
Reciprocating Internal Combustion Engines/Blowers Two (2) @ 4.86 MMBtu/hr, each SCC Code 2-02-002-53	0.0313	0.0313	0.0255	103	1.34	71.5
Digester Waste Gas Flare One (1) @ 1.15 MMBtu/hr SCC Code (5-02-006-01) 5-01-004-10	0.1427	0.1427	0.000	0.336	0.000	6.30
Natural gas-fired Boilers #2 and #3 @ 6.75 MMBtu/hr, each	0.112	0.449	0.0355	5.91	0.325	4.97
Natural or Digester gas-fired Boiler #1 @ 6.75 MMBtu/hr	0.0562	0.225	0.2222	2.96	0.163	2.48
Total (tons/yr):	PM 0.342	PM10 0.848	SO2 0.2832	NOx 112	VOC 1.83	CO 85.3

	Benzene (tons/yr)	Acetaldehyde (tons/yr)	Formaldehyde (tons/yr)	Acrolein (tons/yr)	Toluene (tons/yr)	Dichlorobenzene (tons/yr)	Hexane (tons/yr)	Manganese (tons/yr)
Reciprocating Internal Combustion Engines/Blowers Two (2) @ 4.86 MMBtu/hr SCC Code 2-02-002-53	0.00000468	0.00000204	0.00000307	0.00000409	0.00000979	0.000	0.000	0.000
Digester Waste Gas Flare One (1) @ 1.15 MMBtu/hr SCC Code (5-02-006-01) 5-01-004-10	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Natural gas-fired Boilers #2 and #3 @ 6.75 MMBtu/hr, each	0.000124	0.000	0.00443	0.000	0.000201	0.0000710	0.106	0.0000225
Natural or Digester gas-fired Boiler #1 @ 6.75 MMBtu/hr	0.103	0.00384	0.00868	0.00231	0.00322	0.0000350	0.0530	0.0000112
Subtotals	0.1031	0.0038	0.0131	0.0023	0.0034	0.0001	0.1590	0.000034

	Ammonia (tons/yr)	Xylene (tons/yr)	Naphthalene (tons/yr)	Propylene (tons/yr)	Lead (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Nickel (tons/yr)
Reciprocating Internal Combustion Engines/Blowers Two (2) @ 4.86 MMBtu/hr SCC Code 2-02-002-53	0.00809	0.00000170	0.00000209	0.00000681	0.000	0.000	0.000	0.000
Digester Waste Gas Flare One (1) @ 1.15 MMBtu/hr SCC Code (5-02-006-01) 5-01-004-10	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Natural gas-fired Boilers #2 and #3 @ 6.75 MMBtu/hr, each	0.000	0.000	0.000	0.000	0.0000296	0.0000650	0.0000830	0.000124
Natural or Digester gas-fired Boiler #1 @ 6.75 MMBtu/hr	0.000	0.00109	0.000	0.000	0.0000148	0.0000325	0.0000414	0.0000621
Subtotals	0.0081	0.0011	0.000002	0.000007	0.000044	0.0001	0.0001	0.0002

	Dichloromethane (tons/yr)	Styrene (tons/yr)	1,1,1-Trichloroethane (tons/yr)
Reciprocating Internal Combustion Engines/Blowers Two (2) @ 4.86 MMBtu/hr SCC Code 2-02-002-53	0.000	0.000	0.000
Digester Waste Gas Flare One (1) @ 1.15 MMBtu/hr SCC Code (5-02-006-01) 5-01-004-10	0.000	0.000	0.000
Natural gas-fired Boilers #2 and #3 @ 6.75 MMBtu/hr, each	0.000	0.000	0.000
Natural or Digester gas-fired Boiler #1 @ 6.75 MMBtu/hr	0.00404	0.00226	0.0112
Subtotals	0.0040	0.0023	0.0112

Total HAPs (tons/yr): **0.312**

Summary of Limited Emissions

Waste Water Treatment
SIC Code: 4952

Company Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
 Address City IN Zip: 1251 Joliet Road, Valparaiso, IN 46838
 Part 70: T 127-10673
 Pit ID: 127-00088
 Reviewer: Frank P. Castelli
 Date: February 19, 1999

	PM (tons/yr)	PM10 (tons/yr)	SO2 (tons/yr)	NOx (tons/yr)	VOC (tons/yr)	CO (tons/yr)
1 Reciprocating Internal Combustion Engines/Blowers Two (2) @ 4.86 MMBtu/hr, each SCC Code 2-02-002-53	0.0313 0.005	0.0313 0.005	0.0255 0.004	103 15.794	1.34 0.205	71.5 10.964
2 Digester Waste Gas Flare One (1) @ 1.15 MMBtu/hr SCC Code (5-02-006-01) 5-01-004-10	0.1427	0.1427	0.00	0.336	0.00	6.30
3 Natural gas-fired Boilers #2 and #3 @ 6.75 MMBtu/hr, each	0.112	0.449	0.0355	5.91	0.325	4.97
4 Natural or Digester gas-fired Boiler #1 @ 6.75 MMBtu/hr <i>Subtotal Unlimited of 2 - 4 above</i>	0.0562 0.3109	0.225 0.8167	0.2222 0.2577	2.96 9.206	0.163 0.488	2.48 13.75
Total Limited (tons/yr):	0.316	0.821	0.262	25.000	0.693	24.714

Limited HAPs	Benzene (tons/yr)	Acetaldehyde (tons/yr)	Formaldehyde (tons/yr)	Acrolein (tons/yr)	Toluene (tons/yr)	Dichlorobenzene (tons/yr)	Hexane (tons/yr)	Manganese (tons/yr)
Reciprocating Internal Combustion Engines/Blowers Two (2) @ 4.86 MMBtu/hr SCC Code 2-02-002-53	0.00000072	0.000000031	0.000000047	0.000000063	0.000000150	0.000	0.000	0.000
Digester Waste Gas Flare One (1) @ 1.15 MMBtu/hr SCC Code (5-02-006-01) 5-01-004-10	0.000	0.000	0.00	0.000	0.000	0.000	0.000	0.000
Natural gas-fired Boilers #2 and #3 @ 6.75 MMBtu/hr, each	0.000124	0.000	0.00443	0.000	0.000201	0.0000710	0.106	0.0000225
Natural or Digester gas-fired Boiler #1 @ 6.75 MMBtu/hr Total	0.103 0.103	0.00384 0.004	0.00868 0.013	0.00231 0.002	0.00322 0.003	0.0000350 0.00011	0.0530 0.159	0.0000112 0.00003

Limited HAPs	Ammonia (tons/yr)	Xylene (tons/yr)	Naphthalene (tons/yr)	Propylene (tons/yr)	Lead (tons/yr)	Cadmium (tons/yr)	Chromium (tons/yr)	Nickel (tons/yr)
Reciprocating Internal Combustion Engines/Blowers Two (2) @ 4.86 MMBtu/hr SCC Code 2-02-002-53	0.00124	0.00000026	0.00000032	0.00000104	0.000	0.000	0.000	0.000
Digester Waste Gas Flare One (1) @ 1.15 MMBtu/hr SCC Code (5-02-006-01) 5-01-004-10	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Natural gas-fired Boilers #2 and #3 @ 6.75 MMBtu/hr, each	0.000	0.000	0.000	0.000	0.0000296	0.0000650	0.0000830	0.000124
Natural or Digester gas-fired Boiler #1 @ 6.75 MMBtu/hr Total	0.000 0.001	0.00109 0.001	0.000 0.000	0.000 0.00000	0.0000148 0.00004	0.0000325 0.00010	0.0000414 0.00012	0.0000621 0.00019

Limited HAPs	Dichloromethane (tons/yr)	Styrene (tons/yr)	1,1,1-Trichloroethane (tons/yr)
Reciprocating Internal Combustion Engines/Blowers Two (2) @ 4.86 MMBtu/hr SCC Code 2-02-002-53	0.000	0.000	0.000
Digester Waste Gas Flare One (1) @ 1.15 MMBtu/hr SCC Code (5-02-006-01) 5-01-004-10	0.000	0.000	0.000
Natural gas-fired Boilers #2 and #3 @ 6.75 MMBtu/hr, each	0.000	0.000	0.000
Natural or Digester gas-fired Boiler #1 @ 6.75 MMBtu/hr Total	0.00404 0.004	0.00226 0.002	0.0112 0.011

Total Limited HAPs (tons/yr): **0.305**

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MMBtu/hr <100
Reciprocating Internal Combustion Engines/Blowers

Page 3 of 6 TSD App A

Company Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Address City IN Zip: 1251 Joliet Road, Valparaiso, IN 46838
Part 70: T 127-10673
Pit ID: 127-00088
Reviewer: Frank P. Castelli
Date: February 19, 1999

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

Limited Throughput
MMCF/yr

9.72 85.1 13.053 Equivalent to NOx emissions of 15.794 tons per yr
Two (2) R.I.C. Engines/Blowers @ 4.86 MMBtu/hr, each
SCC Code 2-02-002-53

		Pollutant				
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	0.735	0.735	0.600	2420	31.5	1680
Potential Emission in tons/yr Two (2) R.I.C. Engines/Blowers @ 4.86 MMBtu/hr, each, burning Natural Gas	0.0313	0.0313	0.0255	103	1.34	71.5
Total:	0.0313	0.0313	0.0255	103	1.34	71.5

*PM emission factor is filterable PM only. PM10 emission factor is equal to PM.

HAPs Emissions Reciprocating Internal Combustion Engines MMBtu/hr <100

Emission Factor in lb/MMcf	Benzene	Acetaldehyde	Formaldehyde	Acrolein	Toluene
	1.10E-04	4.80E-06	7.20E-06	9.60E-06	2.30E-05
Potential Emission in tons/yr Two (2) R.I.C. Engines/Blowers @ 4.86 MMBtu/hr, each, burning Natural Gas	4.68E-06	2.04E-07	3.07E-07	4.09E-07	9.79E-07
Total:	4.68E-06	2.04E-07	3.07E-07	4.09E-07	9.79E-07

Emission Factor in lb/MMcf	Ammonia	Xylene	Naphthalene	Propylene
	1.90E-01	4.00E-05	4.90E-05	1.60E-04
Potential Emission in tons/yr Two (2) R.I.C. Engines/Blowers @ 4.86 MMBtu/hr, each, burning Natural Gas	8.09E-03	1.70E-06	2.09E-06	6.81E-06
Total:	8.09E-03	1.70E-06	2.09E-06	6.81E-06

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from the U.S. EPA - FIRE 6.2, 9/20/99, SCC Code 2-02-002-53

NOx emission factor, uncontrolled = 2420 lbs/MMCF, NSCR (non-selective catalytic reduction) = 609 lbs/MMCF

CO emission factor, uncontrolled = 1680 lbs/MMCF, NSCR (non-selective catalytic reduction) = 2520 lbs/MMCF

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

The five highest organic and metal HAPs emission factors are provided above.

Appendix A: Emissions Calculations

Page 4 of 6 TSD App A

Methane Gas Combustion Only**MMBtu/hr <100****Digester Waste Gas Flare****Company Name: City of Valparaiso, Elden Kuehl Pollution Control Facility****Address City IN Zip: 1251 Joliet Road, Valparaiso, IN 46838****Part 70: T 127-10673****Plt ID: 127-00088****Reviewer: Frank P. Castelli****Date: February 19, 1999**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

1.15

16.8

One (1) Digester Waste Gas Flare @ 1.15 MMBtu/hr

SCC Code (5-02-006-01) 5-01-004-10

Pollutant

	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	17.0	17.0	0.00	40.0	0.00	750
Potential Emission in tons/yr	0.1427	0.1427	0.000	0.336	0.000	6.30

*PM emission factor is filterable PM only. PM10 emission factor is equal to PM.

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/600 MMBtu (Heat Content of Digester = 600 Btu/cf)

Emission Factors are from the U.S. EPA - FIRE 6.2, 9/20/99, SCC Code 5-01-004-10

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Appendix A: Emissions Calculations
Insignificant Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Page 5 of 6 TSD App A

Company Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Address City IN Zip: 1251 Joliet Road, Valparaiso, IN 46838
Part 70: T 127-10673
Plt ID: 127-00088
Reviewer: Frank P. Castelli
Date: February 19, 1999

Boilers #2 and #3 @ 6.75 MMBtu/hr, each

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

13.5

118

Criteria Pollutants

	PM*	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 *see below	5.5	84.0
Potential Emission in tons/yr	0.112	0.449	0.0355	5.91	0.325	4.97

*PM emission factor is filterable only. PM10 emission factor is filterable and condensible PM10 combined

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	0.000124	0.0000710	0.00443	0.106	0.000201

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	0.0000296	0.0000650	0.0000828	0.0000225	0.000124

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

The five highest organic and metal HAPs emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
Worst Case Digester Vs. Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Page 6 of 6 TSD App A

Company Name: City of Valparaiso, Elden Kuehl Pollution Control Facility
Address City IN Zip: 1251 Joliet Road, Valparaiso, IN 46838
Part 70: T 127-10673
Plt ID: 127-00088
Reviewer: Frank P. Castelli
Date: February 19, 1999

Boiler #1 @ 6.75 MMBtu/hr
Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.75

59.1

on Natural Gas

Natural Gas Criteria Pollutants						
Emission Factor in lb/MMCF	PM* 1.9	PM10 7.6	SO2 0.6	NOx 100.0 *see below	VOC 5.5	CO 84.0
Potential Emission in tons/yr	0.0562	0.225	0.0177	2.96	0.163	2.48

*PM emission factor is filterable only. PM10 emission factor is filterable and condensable PM10 combined

Natural Gas HAPs - Organics					
Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	0.0000621	0.0000355	0.00222	0.0532	0.000101

Natural Gas HAPs - Metals					
Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	0.0000148	0.0000325	0.0000414	0.0000112	0.0000621

Boiler #1 @ 6.75 MMBtu/hr
Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.75

98.7

on Digester Gas

Digester Gas Criteria Pollutants						
Emission Factor in lb/MMCF	PM 0.0	PM10 0.0	SO2 4.5	NOx 0.0	VOC 3.0	CO 0.0
Potential Emission in tons/yr	0.000	0.000	0.2222	0.00	0.148	0.00

Digester Gas HAPs					
Emission Factor in lb/MMBtu	Acetaldehyde 1.3E-04	Acrolein 7.8E-05	Benzene 3.5E-03	Dichloromethane 1.4E-04	Formaldehyde 2.9E-04
Potential Emission in tons/yr	0.00384	0.00231	0.103	0.00404	0.00868

Digester Gas HAPs				
Emission Factor in lb/MMBtu	Xylenes 3.7E-05	Styrene 7.6E-05	Toluene 1.1E-04	1,1,1 -Trichloroethane 3.8E-04
Potential Emission in tons/yr	0.00109	0.00226	0.00322	0.0112

Methodology:

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Natural Gas Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Natural Gas PM emission factors are condensable and filterable.

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF of Natural Gas/1,000 MMBtu

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF of Digester Gas/ 600 MMBtu (Applicant Supplied)

Natural Gas Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Natural Gas Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Digester Gas Criteria Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Digester Gas HAPs Emissions (tons/yr) = (Heat Input Capacity (MMBtu/hr) x 8,760 (hrs/yr) x Emission Factor (lb/MMBtu)) / 2000 (lbs/ton)

The five highest organic and metal HAPs Natural Gas emission factors are provided above.

Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Digester Gas Emission Factors are from USEPA FIRE 6.2 SCC#10300701